

EXHIBIT R

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

30(B)(6) VIDEOTAPED DEPOSITION OF DAWN RUDOLPH

July 02, 2015



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1 Interrogatory No. 21?
 2 Q. Well, that's what it says on this paper
 3 right here, on Exhibit 450.
 4 A. Oh, and I was looking at Exhibit 452.
 5 Q. Yes.
 6 A. So I apologize.
 7 Q. That's all right.
 8 A. Okay. Subject to --
 9 Q. I'm going to blame Adam for this one. I
 10 think Adam is to blame.
 11 A. Without waiving the foregoing, please see
 12 response -- okay. Yes.
 13 Q. And that remains an accurate response to
 14 Interrogatory No. 22; correct?
 15 A. Yes.
 16 Q. Okay. And then you supplemented by saying
 17 over here that you supplement the prior response by
 18 saying based on the information currently known and
 19 other than the information reflected in the services
 20 agreement between STOPNC and St. Thomas Health
 21 Services, no?
 22 A. Correct.
 23 Q. And so both of those responses are the
 24 complete and accurate response to Interrogatory No.
 25 22; correct?

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1 A. Yes. Thank you.
 2 Q. That's all right. That was --
 3 MR. SCHRAMEK: And for the record,
 4 the second one you read says supplemental
 5 answer, not amended. So it's being
 6 supplemented.
 7 MR. GASTEL: Okay.
 8 THE WITNESS: Thank you.
 9 MR. GASTEL: That was just the
 10 clarification that I was looking for.
 11 Q. (By Mr. Gastel) All right. Let's go to
 12 your response to Interrogatory 23.
 13 A. Okay.
 14 Q. Which, I believe, is substantively answered
 15 only in Exhibit 452; is that correct?
 16 A. That is correct.
 17 Q. Is there any reason why this is not a -- is
 18 there any reason why this is not a complete and
 19 accurate answer to Exhibit No. 23 -- or, I'm sorry
 20 Interrogatory No. 23?
 21 A. No.
 22 MR. SCHRAMEK: And I want to note for
 23 the record that the interrogatory was
 24 objected to as vague and ambiguous and
 25 overly broad and that the St. Thomas

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1 Hospital did the best it could to answer it
 2 based on the question asked.
 3 Q. (By Mr. Gastel) What does the term -- I'm
 4 sorry. You see in your response to Interrogatory No.
 5 23 it begins that St. Thomas Hospital and St. Thomas
 6 Network are sister companies. Do you see that first
 7 sentence of the answer?
 8 A. Yes.
 9 Q. What does that mean?
 10 A. St. Thomas Health is the parent
 11 corporation, 100 percent ownership of St. Thomas
 12 Hospital, 100 own -- 100 percent ownership of St.
 13 Thomas Network. So sister would be the analogy.
 14 Q. What are the certain common board members
 15 for officers between St. Thomas Hospital and St.
 16 Thomas Network in 2012?
 17 A. Are you asking who specifically are the
 18 board members?
 19 Q. Yeah. It says other than certain common
 20 board members or officers, these entities have no
 21 operational relationship with each other. Did I read
 22 that sentence correctly?
 23 A. Uh-huh (affirmative).
 24 Q. My question is: What are the common board
 25 members between St. Thomas Hospital and St. Thomas

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1 Network in 2012?
 2 A. Let me make sure I'm accurate.
 3 THE WITNESS: Is this reflective of
 4 2012?
 5 MR. SCHRAMEK: I believe so.
 6 THE WITNESS: Is this reflective of
 7 2012?
 8 Q. (By Mr. Gastel) I don't know. Is it
 9 reflective of 2012? I mean, I'm sure Adam -- I mean,
 10 if Adam will permit me, I'll give all of the testimony
 11 today, but I have a feeling he won't do that, let me
 12 do that.
 13 MR. SCHRAMEK: Okay. Yeah, again, I
 14 think if we look at 21279, at least that
 15 document which is -- appears to be at least
 16 attached to the org chart says summary as
 17 of October 27th, 2011. I'm suggesting it
 18 would have been in place in 2012, but do
 19 you know?
 20 THE WITNESS: I don't know off the
 21 top of my head.
 22 Q. (By Mr. Gastel) So you don't know who the
 23 board members were in St. Thomas -- of St. Thomas
 24 Network in 2012?
 25 A. I do not.

**Exhibit 447-Deposition of Rudolph
File Under Seal.**